

June 24, 2024

The Honorable Xavier Becerra
Secretary of Health and Human Services
200 Independence Avenue SW
Washington, DC 20201

Dear Mr. Secretary,

On behalf of the undersigned 50 organizations, **we urge you to issue a directive to require that all food service operations in Department of Health and Human Services (HHS) facilities – including all new and renegotiated contracts and permits – meet the standards outlined in the *Food Service Guidelines for Federal Facilities* (FSG).**

Background on the FSG

Developed by an interagency working group led by the Centers for Disease Control and Prevention (CDC), the FSG are evidence-based best practices to align food service in federal facilities with the *Dietary Guidelines for Americans* and advance food safety, facility efficiency, environmental support, and community development.¹

Since their inception in 2011, use of the FSG has been voluntary, and uptake in federal facilities has been slow and uneven.² In 2022, the Biden-Harris Administration National Strategy on Hunger, Nutrition, and Health made the critical commitment to updating and implementing the FSG throughout the federal government.³ This commitment acknowledged that the federal government must lead by example to “empower all consumers to make and have access to healthy choices.”

HHS can advance its mission by adopting the FSG department-wide

HHS has an opportunity to lead by example within the federal government by formalizing a department-wide policy by the end of this Presidential term. Requiring implementation of the FSG in HHS facilities would serve multiple HHS missions and initiatives. Expanding the availability of whole grains, fruits, vegetables, plant-based protein options, and foods and beverages lower in added sugar, saturated fat, and sodium would be expected to improve diet quality for HHS employees, leading to better health outcomes and lower healthcare costs over time.⁴ It will also send a clear signal to employees, patients, and visitors that HHS is willing to “walk the walk” with respect to modeling a healthy food environment. Consistent with HHS’s sustainability efforts, the FSG include environmentally responsible practices for food service operations, such as food waste reduction and diversion.⁵

The foundation has been laid

Although in general, voluntary implementation of the FSG has been slow, progress within individual agencies and facilities, including within HHS, demonstrates what is possible.⁶ For example, the Hubert H. Humphrey Building cafeteria was the first federal food service operation to include the guidelines in a vendor solicitation and contract in 2010.⁷ Subsequently, the vendor reported an increase in monthly sales of 34 percent. In 2018, CDC adopted an internal policy requiring all new and renegotiated food service contracts and permits for CDC-owned and operated dining and vending facilities to meet the current FSG.⁸

For patient food service in Indian Health Service facilities, HHS can look to the Veterans Health Administration (VHA) as a model. The VHA's patient food services are guided by an agency-wide directive that requires the agency to serve regionally and culturally appropriate foods that meet the VA Healthy Diet Guidelines, which are based in part on the FSG.⁹

Our next steps, together

There are numerous resources, peer government agencies, and technical assistance partners (including several of the undersigned organizations) available to support HHS.^{10,11} We look forward to partnering with you to transform the food environment in HHS and beyond.

Please direct your response to Jessi Silverman, Center for Science in the Public Interest at jsilverman@cspinet.org.

Sincerely,

American Public Health Association
American Society for the Prevention of Cruelty to Animals (ASPCA)
Animals Are Sentient Beings Inc
Ann & Robert H. Lurie Children's Hospital of Chicago
Association of State Public Health Nutritionists
Balanced
Brighter Green
Bronx Eats
Center for Biological Diversity
Center for Good Food Purchasing
Center for Science in the Public Interest
Ceres Community Project
Chilis on Wheels
Christian Animal Rights Association
Climate Save Movement
Dental Group SD
Earthjustice
Environmental Working Group
Family Farm Defenders
Farm Forward
Farm Sanctuary
Food is Medicine Institute at Tufts University
FOUR PAWS USA
Friends of the Earth U.S.
Good Food Buffalo Coalition
Green New Deal Network
Greener by Default
Harvard Law School Food Law and Policy Clinic
Health Care Without Harm
Healthy Savannah
Just Serve LCC
Kitchen Sync Strategies
Lady Freethinker
Laure M. Tisch Center for Food, Education and Policy
Mercy for Animals

National Association of Pediatric Nurse Practitioners
North American Climate, Conservation and Environment (NACCE)
Plant Based Treaty
Public Justice Center
Real Food Media
Redstone Global Center for Prevention and Wellness
Resource Renewal Institute
Rural Coalition
Santa Cruz Climate Action Network
Society of Behavioral Medicine
Striving to Serve Others
Terra Advocati
Voters For Animal Rights
Wholesome Wave
World Animal Protection

¹Food Service Guidelines Federal Workgroup. *Food Service Guidelines for Federal Facilities*. U.S. Department of Health and Human Services. 2017.

https://www.cdc.gov/obesity/downloads/guidelines_for_federal_concessions_and_vending_operations.pdf.

²U.S. Government Accountability Office. Federal Food Service Operations: Implementation of the HHS/GSA Health and Sustainability Guidelines. December 23, 2014. GAO-15-262R. <https://www.gao.gov/products/gao-15-262r>.

³Biden-Harris Administration National Strategy on Hunger, Nutrition, and Health. September 2022.

<https://www.whitehouse.gov/wp-content/uploads/2022/09/White-House-National-Strategy-on-Hunger-Nutrition-and-Health-FINAL.pdf>

⁴Abrahams-Gessel S, et al. Implementing federal food service guidelines in federal and private worksite cafeterias in the United States leads to improved health outcomes and is cost saving. *J Public Health Pol.* 2022;43:266-280.

⁵U.S. Department of Health and Human Services. HHS Sustainability. March 8, 2024.

<https://www.hhs.gov/about/sustainability/index.html>

⁶Santo R, Silverman J. Values-Aligned Food Purchasing and Service: Promising Examples from US Federal Agencies and Programs. 2023. Available at <https://www.fedgoodfoodpurchasing.org/resources>.

⁷Bayne AI, et al. The HHS Hubert H. Humphrey Building Cafeteria Experience: Incorporation of the *Dietary Guidelines for Americans, 2010* into Federal Food Service Guidelines. Prepared by NORC at the University of Chicago. U.S. Department of Health and Human Services. May 2012.

⁸Centers for Disease Control and Prevention. Food Service Guidelines in CDC-Owned or -Operated Dining and Vending Facilities. Policy # CDC-AM-2018-01. July 25, 2023. <https://www.cdc.gov/other/pdf/FSG-Policy-CDC-20230725.pdf>.

⁹Department of Veterans Affairs Veterans Health Administration (2019, amended 2022). VHA Directive 1439. Food Service Management. https://www.va.gov/vhapublications/ViewPublication.asp?pub_ID=8557.

¹⁰Centers for Disease Control and Prevention. Food Service Guidelines Implementation Toolkit. January 4, 2023. <https://www.cdc.gov/nutrition/food-service-guidelines/implementation-toolkit.html>.

¹¹Center for Science in the Public Interest. Healthy, Values-Aligned Government Food Purchasing and Food Service: Your toolkit to support advocacy and implementation. 2024. <https://www.cspinet.org/page/healthy-values-aligned-government-food-purchasing-and-service-toolkit-advocates>.